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9	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
11 12	OAKLAND DIVISION
13	UNITED STATES OF AMERICA, Case No. 4:24-CR-00414 JSW
14	Plaintiff, DECLARATION OF NIKHIL BHAGAT IN
15	v. SUPPORT OF GOVERNMENT'S RESPONSE v. TO DEFENDANT'S SENTENCING
16	CASEY ROBERT GOONAN,) MEMORANDUM)
17	Defendant.
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19	I, Nikhil Bhagat, do hereby declare:
20	1. I am an Assistant United States Attorney for the Northern District of California, and I am
21	assigned to prosecute the above-captioned matter.
22	2. On February 20, 2025, my office produced discovery to counsel for the defendant in this
23	case. That discovery consisted of Mr. Goonan's jail calls and selected portions of his correspondence
24	ranging from in or about July 2024 through in or about January 2025.
25	3. I am informed and believe that the exhibits attached hereto are what they purport to be.
26	4. Exhibit 1 is a recording from the Santa Rita Jail of a telephone call that Mr. Goonan had
27	on May 19, 2025 with S.E., a person known to the defendant.
28	5. Exhibit 2 is a report from the Bureau of Alcohol, Tobacco, Firearms, and Explosives
	DECL. OF NIKHIL BHAGAT 1 4:24-CR-00414 JSW

describing an agent's analysis of the cellular tower data and specific data collected for Mr. Goonan's cellular phone during the criminal activity at issue. Exhibit 3 is a report detailing evidence from Mr. Goonan's Maps application appearing 6. to show that he looked up various locations associated with UC Berkeley on a particular day, including the UC Berkeley police station. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Dated at San Francisco, California this 18th day of September, 2025. /s/ Nikhil Bhagat **NIKHIL BHAGAT**